

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

September 21, 2020

Application granted.

SO ORDERED.


NAOMI REICE BUCHWALD

UNITED STATES DISTRICT JUDGE

Dated: New York, NY

September 22, 2020

By ECF

Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Ameen Keshavjee, 20 Cr. 169 (NRB)

Dear Judge Buchwald:

I write with the consent of the Government and Pretrial Services to request a modification to the terms of Ameen Keshavjee's bond. Mr. Keshavjee is currently subject to electronic monitoring with a curfew. I request that his curfew be replaced with the requirement of stand-alone GPS monitoring.

Mr. Keshavjee's curfew has been largely compatible with his employment requirements up to this point. Today, however, Mr. Keshavjee started a new job as a Senior Consultant in Business Continuity and Disaster Recovery at a bank. Although Mr. Keshavjee generally will be working on a conventional, daytime schedule, his new role places him on the front lines of any potential disaster or emergency that the bank might face and therefore requires that he be "on-call" 24 hours per day, seven days per week to help coordinate the bank's response in such a situation. According to Pretrial Services, this requirement of Mr. Keshavjee's new job is incompatible with a curfew. As a result, Pretrial suggested and consents to a modification from a curfew to stand-alone GPS monitoring. With stand-alone GPS monitoring, Mr. Keshavjee's movements would still be monitored, but there would be no requirement that he remain in his home during any particular set of hours.

As noted, the Government and Pretrial both consent to this modification. Thank you for considering it.

Respectfully submitted,

/s/ Ariel Werner

Ariel Werner

Assistant Federal Defender

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cc: Samuel Adelsberg, Assistant U.S. Attorney
Jonathan Lettieri, U.S. Pretrial Services Officer